

IX. Verification of Compliance Audits Program

Nevada Division of Environmental Protection

Chemical Accident Prevention Program

Element Audit Checklist

Revision 3, 09/08/2016



Facility:	Process(es) Covered:		HHS(s):	
Completion Score History	Date	Part A Score	Part B Score	
	xx/xx/xxxx	xx%	xx%	
A. PROCEDURE/POLICY REVIEW				
Documents Reviewed				
Date Reviewed	Title of Document	Rev. #	Date	# Pgs.
1) CONDUCTING THE AUDIT			NAC Ref.	Resp. Code
<i>Item #1 Completion Score – Weighted 30% of Part A</i>			<i>x / 2 = xx%</i>	
i.	Does the program procedure require that the audit be conducted and the evaluation certified at least once every three years; and does the procedure define the responsible individual who certifies the evaluation?		459.95427(1a) 459.95341	
ii.	Does the program procedure define the review criteria, acceptance criteria, and responsible individual(s) who conduct the review of each of the following elements:		459.95427(1a) 459.95341	
a.	Process Safety Information		459.95427(1a) 459.95341	
b.	Process Hazard Analysis		459.95427(1a) 459.95341	
c.	Standard Operating Procedures		459.95427(1a) 459.95341	
d.	Training		459.95427(1a) 459.95341	
e.	Mechanical Integrity		459.95427(1a) 459.95341	
f.	Management of Change		459.95427(1a) 459.95341	
g.	Pre-Startup Safety Review		459.95427(1a) 459.95341	

Response Code (Point Value): Y = Yes (1), N = No (0), NA = Not Applicable (Not Scored), U = Undetermined (0), P = Partially Satisfied (½), NR = Not Reviewed (Not Scored), R = Reviewed (1)

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h. Verification of Compliance Audit		459.95427(1a) 459.95341	
i. Incident Investigation		459.95427(1a) 459.95341	
j. Employee Participation		459.95427(1a) 459.95341	
k. Hot Work Permit		459.95427(1a) 459.95341	
l. Contractor Program		459.95427(1a) 459.95341	
m. Emergency Response Program		459.95427(1a) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 1):			
2) PERSON CONDUCTING THE AUDIT		NAC Ref.	Resp. Code
<i>Item #2 Completion Score – Weighted 30% of Part A</i>		x / 1 = xx%	
i. Does the program procedure require that the audit be conducted by at least one person that is knowledgeable in the process being audited; and does the procedure define the criteria for auditor selection?		459.95427(2) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 2):			
3) REPORT AND RECOMMENDATION TRACKING		NAC Ref.	Resp. Code
<i>Item #3 Completion Score – Weighted 30% of Part A</i>		x / 4 = xx%	
i. Does the program procedure require that a report of the findings be generated; and does the procedure define the individual(s) responsible to generate the report?		459.95427(1b) 459.95341	
ii. Does the program procedure require that appropriate responses to deficiencies be determined and documented; and does the procedure define how responses are generated and the individual(s) responsible?		459.95427(1c) 459.95341	
iii. Does the program procedure require that actions taken to correct deficiencies be documented; and does the procedure define how actions are tracked and the individual(s) responsible?		459.95427(1d) 459.95341	
iv. Does the program procedure require that the two most recent reports be retained?		459.95427(1e)	

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Notes/Comments Pertaining to Responses to Questions under Issue 3):			
4) MANAGEMENT PLAN AND DOCUMENT CONTROL		NAC Ref.	Resp. Code
<i>Item #4 Completion Score – Weighted 10% of Part A</i>		$x / 2 = \mathbf{xx}\%$	
i. Is there a site-specific plan that addresses how the Verification of Compliance Audits Program requirements will be developed and maintained, including:		459.95341	
a. Document the names of person(s) who are members of the team with overall responsibility for the development, implementation and integration of the Verification of Compliance Audits Program Requirements?		459.95341	
ii. Is there a site-specific policy or procedure that addresses how the Verification of Compliance Audits Program documentation is controlled to ensure that the most current information is in circulation and use?		459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 4):			
General Procedure/Policy Review Notes/Comments:			

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B. ON-SITE INSPECTION - RECORDS AUDIT					
1) AUDIT DOCUMENTATION RETENTION <i>List the Last Two Reports in the Following Table:</i>				NAC Ref.	Resp. Code
<i>Item #1 Completion Score – Weighted 50% of Part B</i>				$x / 1 = \mathbf{xx}\%$	
Subject Audit	Were there recommend-ations?	Are all the recommendations implemented?	Audit Start Date	Audit End Date	Report Date
Most Recent Report					
Previous Report					
i. Have the two most recent reports been retained?				459.95427	
Notes/Comments Pertaining to Responses to Questions under Issue 1):					
2) AUDIT THE MOST RECENT VERIFICATION OF COMPLIANCE AUDIT REPORT				NAC Ref.	Resp. Code
<i>Item #2 Completion Score – Weighted 50% of Part B</i>				$x / 9 = \mathbf{xx}\%$	
i. Does the most recent audit report indicate that a review was performed for the program elements pursuant to the procedure review criteria:				459.95427(1a)	
a. Process Safety Information				459.95427(1a)	
b. Process Hazard Analysis				459.95427(1a)	
c. Standard Operating Procedures				459.95427(1a)	
d. Training				459.95427(1a)	
e. Mechanical Integrity				459.95427(1a)	
f. Management of Change				459.95427(1a)	

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g. Pre-Startup Safety Review		459.95427(1a)	
h. Verification of Compliance Audit		459.95427(1a)	
i. Incident Investigation		459.95427(1a)	
j. Employee Participation		459.95427(1a)	
k. Hot Work Permit		459.95427(1a)	
l. Contractor Program		459.95427(1a)	
m. Emergency Response Program		459.95427(1a)	
ii. Was the audit performed within 3 years of the initial startup or the previous audit?		459.95427(1a)	
iii. Was the audit certified?		459.95427(1a)	
iv. Does the report list deficiencies found during the audit?		459.95427(1b)	
v. Are recommendations for correcting deficiencies documented?		459.95427(1c)	
vi. Are the recommendations tracked through completion?		459.95427(1d)	
vii. Are persons who performed the audit identified?		459.95427(2)	
viii. Is at least one person knowledgeable in the process being audited?		459.95427(2)	
ix. Based upon the response codes to complete items 'a' through 'h' above, is it possible to confirm that the verification of compliance audits program is being implemented in accordance with regulation?		459.95427	
Notes/Comments Pertaining to Responses to Questions under Issue 2):			
General On-Site Inspection and Records Audit Notes/Comments:			

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